

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:)	Chapter 7
)	
FLOOD SPECIALISTS, INC.,)	Case No. 24-15634
)	
Debtor.)	Honorable Judge Michael B. Slade
)	(LAKE COUNTY)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Wednesday, March 19, 2025, at 11:00 a.m.**, I will appear before the Honorable Judge Michael B. Slade, or any judge sitting in his place, **either** in courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604 **or** electronically as described below, and present the United States Trustee's **Motion for Order Reopening Chapter 7 Case Pursuant to 11 U.S.C. § 350(B) and Rule 5010 of the Federal Rules of Bankruptcy Procedure and for Authorization to Appoint a Chapter 7 Trustee**, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and password. The meeting ID for this hearing is **160 817 7512**, and the passcode is **623389**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

/s/ M. Gretchen Silver
M. Gretchen Silver, Trial Attorney
Office of the United States Trustee
219 S. Dearborn, Room 873
Chicago, Illinois 60604
(312) 353-5054

CERTIFICATE OF SERVICE

I, M. Gretchen Silver,

☒ an attorney, certify - or –

☐ a non-attorney, declare under penalty of perjury under the laws of the United States of America

certify that on March 5, 2025, I caused to be served copies of this Notice, Motion, and Proposed Order on the ECF Registrants shown below *via* the Court's Electronic Notice for Registrants and for all other entities listed on the service list, *via* First Class US Mail.

/s/ M. Gretchen Silver

SERVICE LIST

Registrants Served Through the Court's Electronic Notice for Registrants:

- **Adam G. Brief** Ustpregion11.es.ecf@usdoj.gov
- **Ilene F Goldstein** ifgcourt@aol.com IL35@ecfcbis.com
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- **David M Siegel** davidsiegelbk@gmail.com R41057@notify.bestcase.com
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Parties Served via First Class Mail:

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:)	Chapter 7
)	
FLOOD SPECIALISTS, INC.)	Case No. 24-15634
)	
Debtor.)	Honorable Judge Michael B. Slade

**MOTION FOR ORDER REOPENING CHAPTER 7 CASE
PURSUANT TO 11 U.S.C. § 350(b) AND RULE 5010
OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE AND FOR AUTHORIZATION TO
APPOINT A CHAPTER 7 TRUSTEE**

Adam G. Brief, Acting United States Trustee for the Northern District of Illinois, (“U.S. Trustee”), by his attorney M. Gretchen Silver, hereby requests entry of an order reopening this case pursuant to Section 350(b) of the Bankruptcy Code and Bankruptcy Rule 5010 and authorizing the U.S. Trustee to appoint a chapter 7 trustee. In support of his motion, the U.S. Trustee respectfully states as follows:

JURISDICTION

1. The Court has jurisdiction to hear and determine this proceeding under 28 U.S.C. § 157(b)(2) and IOP 15(a) and Local Rule 40.3.1 of the United States District Court for the Northern District of Illinois.

2. Movant is the Acting U.S. Trustee for the Northern District of Illinois and is charged with supervising the administration of bankruptcy cases under 28 U.S.C. § 586(a). The U.S. Trustee has standing to bring this Motion under 11 U.S.C. § 307.

BACKGROUND

3. On October 19, 2024, Flood Specialists, Inc. (“Debtor”) commenced this case by filing a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.

4. Ilene F Goldstein was appointed and served as the chapter 7 trustee (“Chapter 7 Trustee”). On December 14, 2024, a Report of No Distribution was filed [Dkt.7]. On December 16, 2024, the bankruptcy case closed, and trustee was discharged.

5. More recently, the U.S. Trustee received notification from the former Chapter 7 Trustee that there may be newly discovered assets that may be property of the estate and can be administered for benefit of the estate’s creditors.

RELIEF REQUESTED

6. The U.S. Trustee requests that the Court reopen this bankruptcy case and authorize him to appoint a chapter 7 trustee.

7. Section 350 of the Bankruptcy Code provides that:

(a) After an estate is fully administered and the court has discharged the trustee, the court shall close the case.

(b) A case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause.

Rule 5010 of the Federal Rules of Bankruptcy Procedure implements Section 350(b).

8. Based on the foregoing, the U.S. Trustee requests that the Court reopen this bankruptcy case and authorize him to appoint a chapter 7 trustee to further investigate and determine whether assets are available for creditors and for any other action the chapter 7 trustee deems necessary.

WHEREFORE, the U.S. Trustee respectfully requests the Court enter an order: (1) reopening this case; (2) authorizing the U.S. Trustee to appoint a chapter 7 trustee to administer the estate and for such other and (3) granting such further relief as this Court deems appropriate.

RESPECTFULLY SUBMITTED,

ADAM G. BRIEF
ACTING UNITED STATES TRUSTEE

Dated: March 5, 2025

/s/ M. Gretchen Silver
M. Gretchen Silver, Trial Attorney
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